



ConwayCourt

Reporting_____

Transcript of the Testimony of
WARDEN STEPHEN ARNOLD

Date: NOVEMBER 15, 2018

**Re: SHIPP VS. CORRECT CARE SOLUTIONS, LLC, ET
AL**

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<p style="text-align: center;">Page 34</p> <p>1 Q Okay. So you don't know -- you don't have any testimony 2 as far as whether that was done or not?</p> <p>3 A No.</p> <p>4 Q And you --</p> <p>5 A The only testimony I have is that the resident would have 6 been told he needed to see Medical.</p> <p>7 Q And that's from your handwriting there?</p> <p>8 A That's correct.</p> <p>9 Q And you called them "special shoes"; right?</p> <p>10 A "If you need special shoes, you will need to see Medical."</p> <p>11 Q Why do you call them "special shoes"?</p> <p>12 A Because that's what he says.</p> <p>13 Q Okay. He calls them "orthotics"; right?</p> <p>14 A Okay. And I'm -- obviously, based on my verbiage, I'm not 15 a medical person. That's why I sent it to Medical.</p> <p>16 Q Do you have any family members who have had diabetes?</p> <p>17 A Yes. My father has diabetes.</p> <p>18 Q When was he first diagnosed with diabetes?</p> <p>19 A Oh, probably ten years ago.</p> <p>20 Q Does he have concerns about his feet or joints related to 21 his feet?</p> <p>22 A My father is in a facility, and he is in bad health, and I 23 really don't think that's important to what we're talking about 24 here.</p> <p>25 Q Well, prior to February of 2016, did your father have any</p>	<p style="text-align: center;">Page 36</p> <p>1 A I referred him to the medical staff, because I'm not a 2 doctor or a practitioner; I'm an administrator.</p> <p>3 Q Do you know why Medical was telling him to send requests 4 to you?</p> <p>5 A I have no idea why Medical was telling him to send 6 requests to me. It's clearly a medical condition.</p> <p>7 Q It's a serious medical condition, isn't it?</p> <p>8 A It's clearly a medical issue, and it was referred to 9 Medical.</p> <p>10 Q Is something that can result in an amputation of a foot a 11 serious medical condition?</p> <p>12 A I think, obviously, that's true.</p> <p>13 Q And so I want to know, who did you speak with in Medical 14 after this request was sent to you?</p> <p>15 A I am sure I would have talked to Ms. Turner.</p> <p>16 Q Okay. So you talked to Ms. Turner on February 1st or 17 February 2nd --</p> <p>18 A I can't tell you what date I talked to her. I'm sure I 19 would have talked to Ms. Turner.</p> <p>20 Q Well, do you know -- if you're saying you're sure you 21 would have, would you have done it on the 1st, 2nd, or 3rd?</p> <p>22 A I can't tell you.</p> <p>23 Q Would you have waited a week?</p> <p>24 A I wouldn't think so, no.</p> <p>25 Q Would you have waited two weeks?</p>
<p style="text-align: center;">Page 35</p> <p>1 issues with his feet related to his diabetic condition?</p> <p>2 MS. MIDDLETON: I will object on relevance.</p> <p>3 Q Can you answer?</p> <p>4 A I don't want to answer. My father didn't have anything to 5 do with this case.</p> <p>6 Q Does your knowledge of someone with diabetes affect your 7 decision-making in medical decisions?</p> <p>8 A I don't think so.</p> <p>9 Q So you don't care what someone's medical conditions are, 10 do you?</p> <p>11 A No, I'm not saying that at all. That's what you said.</p> <p>12 That's not what I said. I want to make sure that's clear. I 13 did not say that.</p> <p>14 Q On February of 2016, were you aware that someone with 15 diabetes could have issues with their feet?</p> <p>16 A I sent -- this guy's request every time went to the 17 medical staff. We had medical staff onboard. I did my due 18 diligence by getting that person to the medical staff.</p> <p>19 Q And what did you do beyond writing that response to make 20 sure he saw the medical staff?</p> <p>21 A I think there's clear --</p> <p>22 Q I'm talking about --</p> <p>23 A -- in the documents we've looked at, there's clear 24 follow-through that he was seen by the medical staff.</p> <p>25 Q And I'm talking about what you did.</p>	<p style="text-align: center;">Page 37</p> <p>1 A Of course not.</p> <p>2 Q Did you normally communicate with Ms. Turner through 3 emails or in person?</p> <p>4 A Sometimes emails; sometimes in person. Ms. Turner -- we 5 invited Ms. Turner to our management team meetings as a part of 6 that, so we communicated a lot. Sometimes were about medical 7 issues, and sometimes weren't. Sometimes we just communicated 8 throughout the facility. I did a lot of walking when I was at 9 that facility.</p> <p>10 Q Did you ever speak with Mr. Shipp?</p> <p>11 A I'm sure I did.</p> <p>12 Q Do you remember him asking you about your -- about his 13 orthotic shoes?</p> <p>14 A I would not be surprised that he did. I was on those 15 floors every day most days all day. I would go on those floors 16 at 6:00 in the morning, and I would leave there at 10:00 at 17 night, so I'm sure I would have had a conversation with Mr. 18 Shipp.</p> <p>19 Q What would your response have been to him if he asked you 20 about his orthotic shoes?</p> <p>21 A I would probably guess that he would have to see Medical, 22 that I wasn't a doctor.</p> <p>23 Q And so February 1st, 2016, is Mr. Shipp's first day there.</p> <p>24 A Okay.</p> <p>25 Q Do you have any -- do you agree with that?</p>